

From: Mia, Marcia
Sent: Wednesday, November 01, 2017 01:25 PM
To: Hambrick, Amy; Marsh, Karen
Subject: RE: NSPS Quad O/Oa questions

I am going to share the question with Amy and see what she thinks. I didn't find anything in the RTC or preamble that says anything more than what we said in the rule.

Marcia B Mia
Office of Compliance/Air Branch
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

From: Hambrick, Amy
Sent: Tuesday, October 31, 2017 5:50 PM
To: Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS Quad O/Oa questions

Thanks Marcia and all for the feedback. I'll send the responses back (with Marcia's edits).

Marcia, I agree that the interpretation is interesting and would be a good discussion to have.

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Mia, Marcia
Sent: Tuesday, October 31, 2017 3:33 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>
Subject: RE: NSPS Quad O/Oa questions

Some thoughts in red on the first set of questions - in the text below.

For the added question -that is an interesting interpretation she provides. The

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Marcia B Mia
Office of Compliance/Air Branch
2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: augustine, bruce

Sent: Tuesday, October 31, 2017 2:55 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: NSPS Quad O/Oa questions

Im also ok with the responses. Thanks

Bruce J. Augustine

Environmental Scientist

Office of Air Enforcement & Compliance Assistance

USEPA Region III

1650 Arch Street

Mailcode: 3AP20

Philadelphia, PA 19103

(215) 814-2131

From: Marsh, Karen

Sent: Tuesday, October 31, 2017 10:07 AM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: NSPS Quad O/Oa questions

I'm ok with these responses.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Hambrick, Amy

Sent: Monday, October 30, 2017 11:39 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: Re: NSPS Quad O/Oa questions

Opps with the last followup question that Kris M. sent in:

Following up on my prior question, does EPA support excluding fugitive emission components on non-fractured wells/wellheads based on the following rationale?

- 1) §60.5397a(f)(1) ties the initial LDAR survey timing to within 60 days of "startup of production."
- 2) "startup of production" per §60.5430a is associated with the initial flow following the end of "flowback"
- 3) "flowback" is defined in §60.5430a as beginning after hydraulic fracturing.
- 4) Therefore only components at well sites where wells have been hydraulically fractured are potentially subject to LDAR.

If not, is there another basis for excluding components at non-fractured oil/gas wells (conventional wells) from being considered an affected facility per §60.5365a(i)?

Draft---

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From: Hambrick, Amy

Sent: Monday, October 30, 2017 11:32:43 AM

To: Marsh, Karen; augustine, bruce; Mia, Marcia

Subject: Re: NSPS Quad O/Oa questions

All- thanks for the quick call this morning to talk through these. Based on our conversation, I've updated the draft responses. If everyone is ok with this, I can send the responses back to Kris M., the inquirer.

--- DRAFT---

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From: Marsh, Karen
Sent: Monday, October 16, 2017 11:50:16 AM
To: Hambrick, Amy; augustine, bruce
Subject: RE: NSPS Quad O/Oa questions

Hi Amy and Bruce,

See my thoughts below.

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Hambrick, Amy
Sent: Monday, October 16, 2017 11:03 AM
To: augustine, bruce <augustine.bruce@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>
Subject: Fw: NSPS Quad O/Oa questions

Bruce-- In efforts to coordinate on these questions that Kris sent both of us, please see some of my initial thoughts in red in the below email chain. I am also cc'ing Karen Marsh the fugitives contact for the rule for input on the last question. After we are in agreement with the responses, please let me know how you prefer to get back to Kris (e.g, do you want to send the response or have the response come from OAQPS?).

Thanks,

Amy

From: augustine, bruce
Sent: Tuesday, October 10, 2017 4:29 PM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: 0000a questions

Amy,

Im not sure if you saw the email from CEC consultants with the questions on 0000/0000a? Maybe we can discuss their questions and EPA's response? I'm a little confused as to whether they think a site is subject to 0000, 0000a or both. Lets make sure we're on the same page with respect to a response. Thanks

Bruce J. Augustine
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From: Macoskey, Kris [mailto:kmacoskey@cecinc.com]
Sent: Tuesday, October 10, 2017 4:11 PM
To: augustine, bruce <augustine.bruce@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Blasingame, Ben <bblasingame@cecinc.com>
Subject: RE: NSPS Quad O/Oa questions

Hi Bruce,

Thanks for the quick reply.

We've interpreted "well site" to be different from "well affected facility." So, while 60.5365a(a) establishes "well affected facility" as being connected to fracturing, the definition of "well site" in 60.5430 does not. 60.5430 even says "any oil well" in the definition. And, since the fugitive emissions component affected facility discussion in 60.5365a(i)(2) includes the term "well site," we've understood that fugitives at any well need to be accounted for if they meet the definition of "fugitive emissions components."

It that's incorrect, can you point me to some source of clarification?

Thanks,

Kris

Kristian A. Macoskey, QEP

Senior Air Quality Consultant / Vice President

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From: augustine, bruce

Sent: Tuesday, October 10, 2017 4:03 PM

To: Macoskey, Kris <kmacoskey@cecinc.com>; Hambrick, Amy <Hambrick.Amy@epa.gov>

Cc: Blasingame, Ben <bblasingame@cecinc.com>

Subject: RE: NSPS Quad O/Oa questions

Kris,

Thanks for the email. With respect to Q5, I think you indicated that the well was not hydraulically fractured?

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Bruce J. Augustine

Environmental Scientist

Office of Air Enforcement & Compliance Assistance

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Philadelphia, PA 19103

(215) 814-2131

From: Macoskey, Kris [<mailto:kmacoskey@cecinc.com>]

Sent: Tuesday, October 10, 2017 3:12 PM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; augustine, bruce <augustine.bruce@epa.gov>

Cc: Blasingame, Ben <bblasingame@cecinc.com>

Subject: NSPS Quad O/Oa questions

Hi Amy - thanks for the VM. As suggested, please see our questions:

Also, Bruce - I've included you here since Amy suggested we get your opinion on Item 5.

Thank you both for your help!

1. Is the reporting period for the first annual report under 0000a 10/31/17?

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2. Is the reporting period for that annual report 8/2/16 through 8/1/17?

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3. Do facilities subject only to 0000 continue to report according to the 10/15/16 to 10/14/17 reporting period (due date 90 days after the reporting period ends so 1/15/18 (since the 13th is on a Saturday)).

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4. Where do activities subject to 0000a that occurred between the start of 0000a (9/18/15) and 8/2/16 get reported or are they excluded from reporting?

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5. Bruce - can you provide a determination as to the applicability of the 0000a fugitive emissions component LDAR monitoring to the flowlines attached to the wellhead in the attached photo? This is a shallow vertical well (not fracked) that produces oil/gas. Our interpretation is that this is an affected facility under §60.5365a(i) that's subject to LDAR (non-wellhead equipment would be the pipes and fittings attached to the wellhead valves are applicable). As such, a plan and measurements would be needed for those two short segments of pipe and the associated fittings. Does US EPA agree with that interpretation?

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